

**REMARKS**

**Summary of the Office Action**

Claims 29-33 and 35 stand rejected under 35 U.S.C. §112, second paragraph as allegedly being vague and indefinite.

Claims 29, 31, 32, and 34 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Heffner et al. (US Pub. No. 20030018558).

Claims 30, 33, and 35 rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Heffner et al. in view of Etem (1999), herein referred to as "Etem I."

**Summary of the Response to the Office Action**

Withdrawn claims 1-28 have been cancelled without prejudice or disclaimer. Applicants reserve the right to file divisional applications directed to the non-elected claims. Claims 29-35 have been cancelled in lieu of new claims 36-80. No new matter has been added. Accordingly, claims 36-80 are presently pending for consideration.

**Interview**

Applicants thank the Examiner for the courtesy of allowing a personal interview conducted on October 2, 2007. Based on the discussions of the §112 rejection and the technical distinctions between the present invention and the prior art, Applicants submit new claims 36-80 for consideration.

**Amendments to the Specification**

The Specification has been amended to correct minor typographical errors. No new matter has been added.

**All Claims Comply with §112, Second Paragraph**

Claims 29-33 and 35 stand rejected under 35 U.S.C. §112, second paragraph as allegedly being vague and indefinite. Claims 29-35 have been cancelled. Therefore, Applicants submit that the §112, second paragraph rejections are now moot.

Regarding the Examiner's question of "randomly selecting" a loan, new claims 36-80 recite that the random selection is a computerized method performed by a sample selection module and not by a person. Applicants submit that various computerized random selection techniques are known to one of ordinary skill in the art. In fact, one of the prior art cited by the Examiner (Etem I) explains some examples of known random selection techniques, such as random number generators and tables of random numbers. (Etem I: p. 2, §2.). Accordingly, Applicants submit that new claims 36-80 comply with §112, second paragraph.

**All Claims Comply with § 102 and §103**

Claims 29, 31, 32, and 34 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Heffner et al. Claims 30, 33, and 35 rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Heffner et al. in view of Etem I. As explained above, claims 29-35 have been cancelled. Moreover, to the extent that Heffner et al. and Etem I are found to be relevant to new claims 36-80, Applicants respectfully traverse.

New independent claim 36 recites, in part, “a sample selection module...including a loan aggregation tool to aggregate the loans into a plurality of risk results based on the loan-level data, and a sampling tool to select an amount of the loans from the plurality of risk results up to a designated target loan sample size.” New independent claims 51 and 66 recite, in part, “designating a target loan sample size, aggregating loans in a loan pool into a plurality of risk results based on loan-level data associated with each of one or more loans in the loan pool, and selecting an amount of loans from the plurality of risk results up to the designated target loan sample size.” Applicants submit that Heffner et al. and Etem I, whether taken individually or in combination, fail to teach or suggest at least these features.

For example, Heffner et al., at best, discloses only a search engine to find loans based on loan criteria entered by the user. Heffner et al. fails to teach or suggest at least a designated target loan sample size or designating a target loan sample size. Moreover, because the search engine of Heffner et al. only returns a search result, Heffner et al. fails to teach aggregating the loans into a plurality of risk results and selecting an amount of loans from the risk results up to the designated target loan sample size. Etem I fails to cure at least these deficiencies. Accordingly, Applicants submit Heffner et al. and Etem I, whether taken individually or in combination, fail to teach or suggest at least these features.

New claims 37-50, 52-65, and 67-80 depend from one of independent claims 36, 51, and 66, thereby incorporating all the features of their base claims. Therefore, Applicants submit that

claims 37-50, 52-65, and 67-80 are also allowable over Heffner et al. and Etem I for at least the reasons discussed above.

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**CONCLUSION**

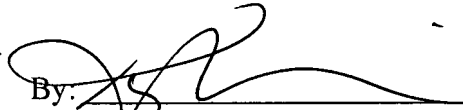
In view of the foregoing, reconsideration and timely allowance of the pending claims are respectfully requested. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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